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Attorneys for Plaintiff
LINDA O'CONNELL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LINDA O'CONNELL,

Plaintiff,

v.

UNUM LIFE INSURANCE COMPANY OF
AMERICA,

Defendant.

Case No.: 3:14-cv-00869 JST

**STIPULATION FOR PLAINTIFF TO FILE
AN AMENDED COMPLAINT ON OR
BEFORE MAY 28, 2014 AND THE
PARTIES TO FILE THEIR JOINT CASE
MANAGEMENT STATEMENT ON OR
BEFORE MAY 29, 2014 FOR THE JUNE 4,
2014 CONFERENCE; ~~PROPOSED~~
ORDER**

IT IS HEREBY STIPULATED by and between the parties hereto through their
respective attorneys that plaintiff LINDA O'CONNELL will file her amended complaint stating
a single claim for benefits under ERISA, 29 U.S.C. § 1001, *et seq.* on or before May 28, 2014,
and for the parties to file their Joint Case Management Statement on or before May 29, 2014 for
the June 4, 2014 Case Management Conference.

1 GOOD CAUSE exists because plaintiff's counsel's mother has recently had a series of
2 cardiac incidents that required him to spend a lot of time in hospitals.

3
4 **RIMAC MARTIN, P.C.**

5 DATED: May 21, 2014

By: /s/ William Reilly
WILLIAM REILLY
Attorneys for Defendant
UNUM LIFE INSURANCE COMPANY OF
AMERICA

8 **LAW OFFICES OF SPRADLIN & FERGUSON**

9 DATED: May 21, 2014

By: /s/ Daymon M. Ferguson
DAMON M. FERGUSON
Attorney for Plaintiff
LINDA PERSONNELLI

12 **IT IS SO ORDERED:**

13 Dated: May 22, 2014

